

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROC-A-FELLA RECORDS, INC.,

PLAINTIFF AND  
COUNTERCLAIM-DEFENDANT,

-AGAINST-

DAMON DASH AND GoDIGITAL RECORDS, LLC,

DEFENDANTS AND  
COUNTERCLAIM-PLAINTIFFS.

Case No. 1:21-cv-05411-JPC

**STIPULATION OF PARTIAL DISCONTINUANCE**

Plaintiff Roc-A-Fella Records, Inc. (“RAF, Inc.”) and Defendants Damon Dash (“Dash”) and GoDigital Records, LLC (“GoDigital”), by and through their respective counsel, stipulate as follows:

WHEREAS, RAF, Inc. filed a complaint on June 18, 2021, naming Dash as a defendant and seeking a judgment declaring that (a) RAF, Inc. owns all the rights to *Reasonable Doubt*, including its copyright; (b) Dash, as a RAF, Inc. shareholder, has no direct ownership interest in *Reasonable Doubt*; (c) Dash is not permitted to sell any interest in *Reasonable Doubt*; and (d) Dash must transfer to RAF, Inc., any NFT or other asset in his possession, custody, or control reflecting rights to Reasonable Doubt (ECF No. 1 at 11);

WHEREAS, also on June 18, 2021, RAF, Inc. moved for a preliminary injunction preventing Dash from “altering in any way, selling, assigning, pledging, encumbering, contracting with regard to, or in any way disposing of any property interest in Reasonable Doubt, including its copyright and including through any means, such as auctioning a non-fungible token (‘NFT’)

reflecting such interests, pending a final determination of the above- captioned lawsuit" (ECF No. 5 at 1);

WHEREAS, on August 6, 2021, RAF, Inc. filed an Amended Complaint, naming GoDigital as an additional defendant;

WHEREAS, on September 8, 2021, Dash and GoDigital answered the Amended Complaint, denied all claims set forth in the Complaint, and asserted Counterclaims against RAF, Inc. (ECF Nos. 54, 55);

WHEREAS, RAF, Inc. alleged in its Amended Complaint that, in November 2018, a representative of GoDigital stated that GoDigital had been "claiming" *Reasonable Doubt*, which caused Youtube to withhold all revenue associated with *Reasonable Doubt* from Live Nation, until the dispute as to the ownership of *Reasonable Doubt* is resolved.

WHEREAS, the term "Dispute Period" as used in this Stipulation shall mean November 1, 2018 to April 8, 2022.

WHEREAS, in its counterclaim, GoDigital informed RAF, Inc. that it only sought to claim its 50% portion of the revenue earned during the Dispute Period pursuant to the AdShare Program Agreement;

WHEREAS, to resolve any and all claims and causes of action asserted in this case by RAF, Inc. against GoDigital, on the one hand, and GoDigital against RAF, Inc., on the other hand, the parties hereby stipulate:

1. All claims brought by RAF, Inc. in the Amended Complaint against GoDigital are hereby discontinued with prejudice;
2. All claims brought by GoDigital against RAF, Inc. are hereby discontinued with prejudice;

3. GoDigital hereby releases any claim that it has placed with any third party on *Reasonable Doubt* as of the date of this Stipulation, and GoDigital agrees not to place any claim upon *Reasonable Doubt*;
4. GoDigital shall cooperate with RAF, Inc. on the transfer of any claim to RAF, Inc.'s designated licensing party; and,
5. Any Youtube revenues for the Dispute Period shall be released to RAF, Inc. with 50% being paid to GoDigital.

DATED: April 25, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Alex Spiro

Alex Spiro  
Luke Nikas  
Paul B. Maslo  
*Attorneys for Roc-A-Fella Records, Inc.*

DATED: April 25, 2022

TURTURRO LAW, P.C.

By /s/ Natraj S. Bhushan

Natraj S. Bhushan  
Eric Howard  
*Attorneys for Damon Dash and GoDigital  
Records, LLC*

By

The Honorable John P. Cronan

**IT IS SO ORDERED.**